

201 Lone Man Overlook  
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May 4, 2009

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U.S. Department of Transportation  
Docket Operations  
West Building Ground Floor W12-140  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

REF: Petition for Rulemaking

Dear Sirs:

I wish to petition the U.S. Department of Transportation for a change to the following described rule:

Code of Federal Regulations, 14 CFR 61.197 (2)(ii);  
Renewal of flight instructor certificate;

Under 14 CFR 11.63 and 14 CFR 11.71, I wish to submit the following information basis for my proposal...

(A)(1) Name and address: William R. Wallace  
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(2) The Code 14 CFR 61.197 part (2)(ii): not explicit enough and does not include a person who is a highly qualified type-rated jet flight and/or simulator instructor under a Part 142 flight school program who instructs both under FAR 91K, 135, and 121 programs. These instructors would be employed by Flight Safety and CAE- SimiFlight, for example.

That instructor not only has to be qualified under 14CFR 142.53(a)(7), but also the instructor individual has ~~to be~~ to teach under Part 135 customer guidelines, (i.e. American Jet, NetJets, FlexJet).

The instructor would also have a current Part 135.293(a), and Part 135.297 check ride under the operator's certificate, but also the Part 142 flight school.

In addition he or she would have to be trained to teach in the simulator per individual certificated Ops Specs for RNAV (GPS) approaches, reduced landing minimums, and lower-than-standard takeoff minimums. He could also be qualified to teach avionics cockpit- based-trainer and aircraft systems ground school.

The FAR 142 approved flight facility usually has programs whereby they instruct: FAR 61.58 PIC Initial and Recurrent training, FAR 61.55 SIC Initial and Recurrent training. FAR 135, FAR 121 PIC/SIC Initial and Recurrent training; usually based evaluation intervals of six (6) or twelve (12) time periods.

The instructor has to sign training records (electronically) indicating the students completion of a individual phases of ground and simulator instruction-leading up to a check ride with a designated TCE or check airman in-house within the training department.

The instructor is in the position of regular evaluation of pilots in his capacity, but not necessarily giving the actual check ride.

(3) 14CFR 61.197 Renewal of flight instructor certificates should state:

(ii) A record showing that, within the preceding 24 months, the flight instructor has served as a company check pilot, chief flight instructor, company check airman, or flight instructor in part 121, 135, or ( 142 training) operations, or in a position involving the regular evaluation of pilots, or.. ^ (additional note)

(4) It would be in the *public interest* to include the instructor in the FAA approved Part 142 flight school. That individual instructor now comprises most of the experience and knowledge that is necessary in a new modern environment with Phase III all-motion simulators used in 99% of training used with most of the major Fortune 500 companies and domestic and international airlines. That training comprises over 35 or 40 makes and models of prop, turbo-prop, and jet aircraft; including the Lear Jet series, Boeing Jet series, Gulfstream series, Beechcraft series aircraft, and up to and including the new Airbus A-380. FAR 142 flight schools include helicopters as well. Individual Far 61 instructors teach the basics with student pilots, private, commercial, instrument ratings, etc. The FAR 142 instructors are the next step in the progression of aviation training.

(5) As previously stated.

(6) As previously stated.

(b)(1) There will be **no additional cost or impact to the general public**. The instructor still has to follow the prescribed renewal procedure with the FAA every twenty-four (24) months as before.  
The FAA will still follow all guidelines for renewal including all airman personal identification relating to TSA rules with no changes in this process.

- (b)(2) There *is* no additional burden placed on small business, small organizations, small government jurisdictions, and Indian tribes.

The general public will actually save money in the long run: The training facilities will be able to utilize that instructor for several additional days in house -VS- the two (2) day approved refresher course needed at a total cost of about \$1200. (2 days salary, travel, motel, food expenses, and course fee) which is probably paid for, down-the-line, by the training client which passes it on to the consumer.

For example, if there were a total of 600 instructors that could utilize the FAR 142 rule change, that would be a total of about \$780,000 dollars indirect savings for two years.

We allow companies to print FAA exam guides giving questions and answers to written tests used in flight training, why not allow improved procedures for the renewal process.

- (b)(3) There would be no additional recordkeeping and reporting burdens with this proposed action.

There could be possibly some government FAA savings also because of the reduced burden of renewal and recordkeeping.

- (b)(4) The quality of the social environment would be improved through a long over-due rule change affecting the time and effort saved by individuals during this process.

Respectfully Submitted



WILLIAM R. WALLACE